



Governor

Lori F. Kaplan
Commissioner

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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(317) 232-8603
(800) 451-6027
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January 6, 2003

Mr. David Roycraft
Grede Foundries, Inc. - New Castle
2700 East Plum Street
New Castle, Indiana 47362

Re: 065-16605
First Significant Permit Modification to
Part 70 No.: T 065-6354-00007

Dear Mr. Roycraft:

Grede Foundries, Inc. - New Castle was issued a permit on August 7, 2002 for a gray iron and ductile iron foundry. A letter requesting changes to this permit was received on September 25, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the removal of the requirement to perform ambient PM-10 monitoring as listed in condition C.13 of the Part 70 permit. Since there have been no violations cited at the source since an Agreed Order was issued on October 27, 1987 to the previous owner, the source is located in a county that is designated as attainment for PM-10, and the Part 70 permit contains additional compliance monitoring requirements for the particulate control equipment that was not included in any of the previous permits issued to this source, IDEM, OAQ has determined that the monitoring data served its purpose and is no longer needed based on the way the plant is currently operated. Therefore, the requirement to perform ambient PM-10 monitoring in condition C.13 will be removed from the Part 70 permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Trish Earls, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (973) 575-2555, ext. 3219 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
TE/EVP

cc: File - Henry County
U.S. EPA, Region V
Henry County Health Department

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Air Compliance Section Inspector - Richard Sekula
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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Grede Foundries, Inc. - New Castle
2700 East Plum Street
New Castle, Indiana 47362

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T065-6354-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 7, 2002 Expiration Date: August 7, 2007
First Significant Permit Modification No. 065-16605-00007	Pages Revised: 2, 3, 23 - 27

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Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 6, 2003
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C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 1, 1996.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this

condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of

this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Grede Foundries, Inc. - New Castle
Source Location:	2700 East Plum Street, New Castle, Indiana 47362
County:	Henry
SIC Code:	3321
Operation Permit No.:	T 065-6354-00007
Operation Permit Issuance Date:	August 7, 2002
Permit Modification No.:	065-16605-00007
Permit Reviewer:	Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Grede Foundries, Inc. - New Castle relating to the operation of a gray iron and ductile iron foundry.

History

During the Part 70 permit review, Grede Foundries, Inc. - New Castle made a request to the OAQ to have the requirement to perform ambient PM₁₀ monitoring removed. The petition to have this removed is based on the following:

- (a) The original requirement in CP-065-2749-00007, issued on March 24, 1993, was for ambient PM-10 monitoring to be performed for a minimum period of two complete years. After this period, Grede may petition for removal of the requirement if it is established to the satisfaction of the Commissioner that ambient PM-10 levels will continue to comply with the National Ambient Air Quality Standards, without adverse effect to the community.
- (b) Grede Foundries, Inc. has performed the required ambient monitoring for approximately six complete years and has not received an opacity violation for the monitored systems during this period.
- (c) In addition, Grede Foundries, Inc. believes that ambient PM-10 levels have been in compliance with the National Ambient Air Quality Standards while ambient monitoring has been in place, and that the community has not been adversely affected during this period by the emissions from the facility.

OAQ Evaluation:

Grede Foundries, Inc. did perform continuous PM-10 monitoring however, since the monitor was located on their property, the data was not considered "ambient data" and was not used for ambient monitoring. The data was for Grede Foundries, Inc. to use as a compliance tool. The requirement to perform ambient PM-10 monitoring in condition C.13 will be removed from the Part 70 permit because:

- (a) There have been no violations cited at the source since an Agreed Order was issued on October 27, 1987 to the previous owner;
- (b) The source is located in a county that is designated as attainment for PM-10;
- (c) The Part 70 permit contains additional compliance monitoring requirements for the particulate control equipment that was not included in any of the previous permits issued to this source;
- (d) IDEM, OAQ has determined that the monitoring data served its purpose and is no longer needed based on the way the plant is currently operated.

There have been no other changes made to the Part 70 permit.

Existing Approvals

The source was issued a Part 70 Operating Permit (T065-6354-00007) on August 7, 2002. The source has received no other approvals since the Part 70 permit was issued.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Justification for Modification

The Title V permit is being modified through a Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d) because the modification is for the relaxation of an existing monitoring requirement in a Part 70 permit.

The following condition will be deleted from the Part 70 permit:

C.13 Ambient Monitoring of Particulate Matter Less than 10 Micrometers (PM-10)

Pursuant to CP-065-2749-00007, issued on March 24, 1993, the owner/operator of this source shall continue its program for ambient monitoring of PM-10, established in CP-065-2749-00007, consistent with guidelines established in 40 CFR Part 50, Appendix J and the IDEM Quality Assurance Manual. The owner may petition to have this monitoring requirement removed if it is established to the satisfaction of the Commissioner that ambient PM-10 levels will continue to comply with National Ambient Air Quality Standards (NAAQS), without adverse effect to the community. To document compliance with this requirement, the Permittee shall maintain records

of the data from the ambient monitoring of PM-10. Data from this monitor shall be submitted on a quarterly basis in the format approved by the Commissioner.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Entire Source and Individual Facilities

There are no new state rules applicable to this source during this modification review process. The applicability determination conducted for the original Part 70 permit T065-6354-00007, issued on August 7, 2002 remains unchanged.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The current compliance monitoring requirements in sections D.1 through D.3 of the Part 70 permit do not change as a result of the removal of the ambient monitoring requirement in condition C.13 of the Part 70 permit.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T065-6354-00007), issued August 7, 2002:

1. The following condition requiring ambient PM-10 monitoring for this source has been removed from the Part 70 permit:

~~C.13 — Ambient Monitoring of Particulate Matter Less than 10 Micrometers (PM-10)~~

~~Pursuant to CP-065-2749-00007, issued on March 24, 1993, the owner/operator of this source shall continue its program for ambient monitoring of PM-10, established in CP-065-2749-00007, consistent with guidelines established in 40 CFR Part 50, Appendix J and the IDEM Quality Assurance Manual. The owner may petition to have this monitoring requirement removed if it is established to the satisfaction of the Commissioner that ambient PM-10 levels will continue to comply with National Ambient Air Quality Standards (NAAQS), without adverse effect to the~~

~~community. To document compliance with this requirement, the Permittee shall maintain records of the data from the ambient monitoring of PM-10. Data from this monitor shall be submitted on a quarterly basis in the format approved by the Commissioner.~~

The subsequent conditions in section C of the Part 70 permit have been re-numbered accordingly and the Table of Contents has been revised to reflect this.

Conclusion

The operation of this gray iron and ductile iron foundry shall be subject to the conditions of the attached proposed Significant Permit Modification No. 065-16605-00007.